VEOLIA
ENVIRONMENTAL SERVICES

May 31, 2013

Ms. Genevieve Damico
Air Permits Section
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590

Re: Veolia ES Technical Solutions, LLC Part 71 Renewal Application
Response to Notification of Incompleteness, May 16, 2013

Dear Ms. Damico:

Veolia ES Technical Solutions, L.L.C. located in Sauget, Illinois (Veolia) received correspondence from USEPA Region 5 (EPA) regarding its application for renewal of the facility's Part 71 Permit to Operate No. V-IL-12716300103-08-01. The notification of incompleteness listed six items for which EPA determined that additional information is required in order to be deemed complete. Veolia response to these items is presented in the following discussion.

Since the original Part 71 permit was issued, September 12, 2008, Veolia has not implemented any operational changes and has not constructed any new equipment since the final application information for Permit No. V-IL-12716399193-08-01 was submitted and reviewed by EPA. Two new regulations, the Boiler MACT and RICE MACT, were published since the existing permit was issued and the applicable requirements for these regulations have been addressed in the renewal application. Based on this and in the interest of avoiding duplication of materials already previously submitted, Veolia relied on cross-referencing the previous application and existing Part 71 permit to obtain information required on application forms. Veolia prepared the Part 71 permit renewal application in this manner based on guidance contained in USEPA's "Federal Operating Permit Program (40 CFR Part 71) INSTRUCTION MANUAL FOR PART 71 FORMS".

Excerpt from Instruction Manual:

Cross-Referencing of Information Already Provided Allowed

> *If you have previously submitted information to EPA or to an approved State agency that is required to be submitted in these application forms, you may either repeat the information in the space provided or cross-reference the relevant materials or documents. Cross-referencing is allowed for materials that are currently applicable and available to the public and the permitting authority. If the materials do not meet this standard they must be submitted as an attachment to the form. All cross-referenced materials will be placed in the public docket on the permit action, unless they are published and/or readily available.*

The detailed response to each item in EPA's notification is provided in the discussion below.

ITEM 1: CITATION AND DESCRIPTION OF ALL APPLICABLE REQUIREMENTS.

As stated above and in the permit renewal application narrative, there have been no physical changes to existing emission units, no new construction of emission units and no change to the operation of existing emission units since the submittal and review by EPA of the permit application for the existing Permit No. V-IL-12716399193-08-01. There are two new regulations that were published that affect the Veolia facility as follows:

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- 40 CFR 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.
- 40 CFR 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The new applicable requirements that will apply or have become effective during the term of the permit are described in Section III.A and III.D of the renewal application. Also included are the effective dates of these regulations. Veolia will be in compliance with all applicable requirements as of the effective date of each rule.

All other applicable requirements are listed in the existing Part 71 permit referenced above and in the application as indicated below. Veolia, therefore, refers EPA to Section IV of the May 2007 application narrative in which applicable requirements are described in detail and Section VI in which compliance demonstration methods are described in detail. In addition, Sections 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7 and 2.8 of the existing Part 71 permit for the translation of the applicable requirements contained in the May 2007 application into permit conditions.

ITEM 2: INITIAL COMPLIANCE PLAN AND CERTIFICATION.

Veolia refers EPA to the FORM I-COMP that was provided in Section I of the application submitted May 2007 including a Compliance Status Table entitled "Addendum to Section I: Form I-Comp". Form I-COMP references Section IV of the application narrative in which applicable requirements are described in detail and Section VI in which compliance demonstration methods are described in detail. The compliance status for each unique combination of applicable requirements is indicated in the Compliance Status Table referenced above. There are no applicable requirements for which the source in not in compliance, therefore, no compliance plan/schedule is required.

ITEM 3: DESCRIPTION AND JUSTIFICATION OF EMISSIONS ESTIMATION METHODS.

Veolia refers EPA to Section V of the May 2007 application for discussion and justification of emission factors, maximum hourly design rates and maximum hourly emission rates with the exception of the drum crusher. Potential to emit rates provided in the EMISS forms and the PTE forms are based on a combination of construction permit limits, 40 CFR 63 Subpart EEE limits and maximum design rate calculations as provided in Section V.C of the May 2007 application. All of these limits also appear in the existing Part 71 permit.

The drum crusher emission factor and emission estimates were re-evaluated as part of the renewal application. The revised emission factor and its basis are provided in Section III.C and Appendix A of the renewal permit application.

In addition, during preparation of this response, several typographical errors were found on the emission calculation forms. Revised forms are included with this document.

ITEM 4: LISTING OF ALL ACTIVE AIR PERMITS AND CONSENT ORDERS ISSUED BY STATE OR FEDERAL AGENCY.

Veolia refers EPA to Section I.A. of the May 2007 application for the permit history of the facility. The Part 71 permit is the only one listed in Section K of the FORM GIS because the existing Part 71 permit contains all federally enforceable applicable requirements from the construction permits issued by the Illinois Department of the Environment (IEPA). There have been no construction permits issued since the Part 71 permit was issued and no Part 71 permit modifications have occurred.

ITEM 5: PROCESS FLOW DIAGRAMS AND FACILITY PLOT PLAN.

Veolia refers EPA to Section III behind the Figure tab in the May 2007 application for labeled site layouts and process flow diagrams. There have been no changes to the diagrams.

ITEM 6: LISTING AND DESCRIPTION OF INAPPLICABLE REQUIREMENTS.

Veolia refers EPA to Appendix B of the May 2007 application for this listing.

CERTIFICATION

In accordance with 40 CFR 71.5(d), the following certification is provided regarding the content of this document and its attachments.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this document and its attachments are true, accurate and complete.

Authorized Signature

Name (signed): Douglas Harris

Name (typed): Douglas Harris Date: 5/31/13

Title: General Manager

Federal Operating Permit Program (40 CFR Part 71)

POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
UNIT #2	4.0	0.9	7.7	2.80	6.6	0.0221	11.06
UNIT #3	4.0	0.9	7.7	2.91	6.6	0.0229	10.40
UNIT #4	61.6	3.1	50.76	8.82	13.86	0.0695	11.56
LABPACK REPACK		1.45					0.2418
MP-1		0.2387					0.0495
MP-2		0.2387					0.0495
DRUM CRUSHER		3.87					0.248
TANK #2		0.1348					0.0002
TANK #4		0.0203					3.65×10^{-5}
TANK #6		0.0133					2.40×10^{-5}

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
TANK #8		0.0256					4.61×10^{-5}
TANK #10		0.0125					2.25×10^{-5}
TANK #20		0.0460					0.0001
TANK #30		0.0203					3.65×10^{-5}
TANK #40		0.0143					2.58×10^{-5}
TANK #50		0.0085					1.53×10^{-5}
TANK #60		0.0257					4.62×10^{-5}
TANK #300		0.1454					0.0003
TANK #302		0.4224					0.0008
TANK #304		0.3094					0.0006
TANK #306		1.29					0.0023
TANK #308		1.62					0.0029
TANK #310		2.18					0.0039
TANK #312		3.23					0.0058
TANK #314		0.4736					0.0009

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
BF BLDG		2.56					0.0188
BOILER #1	4.51	0.248	0.027	0.343	3.79		
FUGITIVE EQUIP LEAKS		0.0390					0.0014
EGEN1	0.42	0.03	0.03	0.03	0.09	0.0	0.0001
EGEN2	0.42	0.03	0.03	0.03	0.09	0.0	0.0001
FACIILTY TOTALS	74.95	23.60	66.25	14.93	31.03	0.1145	33.64

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Unit #2

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
CO		2.55	6.6	
VOM		8.0	0.9	
NOx		3.26	4.0	
PM2.5		0.1405	0.6156	
PM10		0.6388	2.8	
Part		0.6388	2.8	
SOx		1.21	7.7	
HCl/Cl2		2.19	9.92	

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Hg		0.0028	0.0125	7439-97-6
As		0.0020	0.0088	7440-38-2
Be		0.0020	0.0088	7440-41-7
Cd		0.0050	0.0221	7440-43-9
Cr		0.0020	0.0088	7440-47-3
Sb		0.0020	0.0088	7440-31-5
Pb		0.0050	0.0221	7439-92-1
Ni		0.0020	0.0088	7440-02-0
Dioxin/Furan		4.38×10^{-9}	1.92×10^{-8}	

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Unit #3

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
CO		2.65	6.6	
VOM		8.0	0.9	
NOx		3.26	4.0	
PM2.5		0.1462	0.6404	
PM10		0.6646	2.91	
Part		0.6646	2.91	
SOx		1.21	7.7	
HCl/Cl2		2.22	10.03	

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Hg		0.0029	0.0130	7439-97-6
As		0.0021	0.0092	7440-38-2
Be		0.0021	0.0092	7440-41-7
Cd		0.0052	0.0229	7440-43-9
Cr		0.0021	0.0092	7440-47-3
Sb		0.0021	0.0092	7440-31-5
Pb		0.0052	0.0229	7439-92-1
Ni		0.0021	0.0092	7440-02-0
Dioxin/Furan		4.56×10^{-9}	1.20×10^{-7}	

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Unit #4

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
CO		8.03	13.86	
VOM		8	3.1	
NOx		14.61	61.6	
PM2.5		0.4432	1.94	
PM10		2.01	8.82	
Part		2.01	8.82	
SOx		4.23	50.76	
HCl/Cl2		2.38	10.40	

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Hg		0.0090	0.0393	7439-97-6
As		0.0064	0.0278	7440-38-2
Be		0.0064	0.0278	7440-41-7
Cd		0.0159	0.0695	7440-43-9
Cr		0.0064	0.0278	7440-47-3
Sb		0.0064	0.0278	7440-31-5
Pb		0.0159	0.0695	7439-92-1
Ni		0.0064	0.0278	7440-02-0
Dioxin/Furan		1.538×10^{-8}	6.05×10^{-8}	